

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

BellucciLaw, P.C.
450 Tilton Road, Suite 125
Northfield, NJ 08225
(609) 601-1500, Fax (609) 365-2351
Attorney for Debtor(s)
By: Bruno Bellucci, III, Esquire, BB6378
Jennifer L. Kearney, Esquire, 240402017

In Re:

Guy C. Monhollen

Case No.: 17-31601

Chapter.: 13

Judge: Andrew P. Altenburg, Jr.

**CERTIFICATION IN OPPOSITION TO CERTIFICATION OF DEFAULT
OF STANDING TRUSTEE**

I, Jennifer L. Kearney, of full age, having been duly sworn, do hereby certify as follows:

1. I am an attorney at law licensed to practice in the State of New Jersey. As counsel for the debtor, I am fully familiar with the facts and circumstances surrounding this matter, and as such, am providing this Certification in Opposition to Certification of Default of Standing Trustee.

2. Our office filed a Chapter 13 Bankruptcy petition in the United States Bankruptcy Court, District of New Jersey, on October 25, 2017, on behalf of debtor, Guy C. Monhollen.

3. Since the date of filing, debtor diligently made each and every payment to the Chapter 13 Standing Trustee. Additionally, debtor was the main income provider for his wife and three children. Sadly, due to complications with COVID-19 Mr. Monhollen passed away June 16, 2021 (see exhibit A).

4. As such, our office is in the process of creating, filing, and prosecuting a Motion for a Hardship Discharge on behalf of Mr. Monhollen.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: October 4, 2021

/s/ Jennifer L. Kearney
Jennifer L. Kearney, Esquire